# Workforce Innovation and Opportunity Act (WIOA) Unified and Combined State Plan DRAFT

# BRS Vocational Rehabilitation Requirements

12/10/2015

#### Workforce Innovation and Opportunity Act (WIOA) Unified and Combined State Plan Requirements

On July 22, 2014, President Obama signed into law the Workforce Innovation and Opportunity Act (WIOA), which provides federal funding to states to offer job training, education, and career services to individuals who are experiencing high barriers to employment, including homeless jobseekers.

On December 30, 2015, the Connecticut Department of Labor released the <u>State of Connecticut Workforce Innovation and Opportunity Act Unified State Plan Draft</u>, a four-year strategic plan to address the state's workforce development.

This plan provides an excellent opportunity for homeless services stakeholders to provide feedback on the State Plan to ensure that the needs of individuals and families experiencing homelessness are addressed. It includes six WIOA core programs: adult program, dislocated worker program, youth program, Wagner-Peyser Act program, adult education and family literacy act program, and vocational rehabilitation program.

The following pages include the **Program-Specific Requirements for Vocational Rehabilitation services administered by BRS.** Please go to the DOL link above to review the entire Connecticut Unified State Plan Draft.

The public comment period (the opportunity to make changes in the draft State Plan) has ended. If you have questions, you may send them in writing to **Evelyn Oliver Knight** as follows:

- by e-mail to <a href="mailto:evelyn.knight@ct.gov">evelyn.knight@ct.gov</a>; or
- by fax to 860-424-4850; **or**
- by postal delivery to BRS, 55 Farmington Avenue, 12<sup>th</sup> Floor, Hartford, CT 06105.

#### **VOCATIONAL REHABILITATION**

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan <sup>1</sup> must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by WIOA:

- (a) <u>Input of State Rehabilitation Council.</u> All agencies, except for those that are independent consumer-controlled commission, must describe the following:
  - (1) Input provided by the State Rehabilitation Council, including input and recommendations on the VR services portion of the Unified or Combined State Plan, recommendations from the Council's report, the review and analysis of consumer satisfaction, and other Council reports that may have been developed as a part of the Council's functions;
  - (2) The Designated State unit's response to the Council's input and recommendations; and
  - (3) The designated State unit's explanations for rejecting any of the Council's input or recommendations.

#### Input of the State Rehabilitation Council.

The mission of the State Rehabilitation Council (SRC) is to provide assessment, advice and recommendations to the Bureau of Rehabilitation Services (BRS or the bureau) and others regarding coordination and effectiveness of programs and strategies which promote community-based competitive employment for persons with disabilities.

The SRC maintains an ongoing collaboration with BRS. The SRC is comprised of volunteers, many of whom are current or former vocational rehabilitation (VR) consumers or family members of VR consumers. They are appointed by the Governor to review and assess the effectiveness and delivery of vocational rehabilitation services provided for individuals with disabilities who are seeking employment. The SRC has participated in the following endeavors in FY2015:

- 1. development of the BRS 2017 State Plan;
- 2. Community Rehabilitation Providers (CRP) Annual Meeting;
- 3. National Council of State Rehabilitation Councils (NCSRC) Conferences in Bethesda, MD and Miami, FL and Teleconferences (six);
- 4. The Council of State Administrators for Vocational Rehabilitation (CSAVR) Conferences in Bethesda, MD and Miami, FL;
- 5. SRC Meetings (six per year);
- 6. review of the 722 Report regarding Administrative Hearing Outcomes; and
- 7. updates of Corrective Action Plans resulting from the Rehabilitation Services Administration 2013 Monitoring.

#### **WIOA**

In July, 2014, Congress passed the Workforce Innovation and Opportunity Act (WIOA) to unify the state programs that provide employment services. This bill established some significant changes to the Vocational Rehabilitation (VR) program. At the May 2015 SRC meeting, Acting BRS Director, Amy Porter, reviewed the changes that will impact the VR program and plans the agency has undertaken to prepare to adapt to these new requirements and partner with new entities to provide cohesive employment and training programs for all of Connecticut's residents. These changes will be reported in

<sup>&</sup>lt;sup>1</sup> Sec. 102(b)(2)(D)(iii) of WIOA

the upcoming Unified State Plan due March 3, 2016. The SRC worked to better understand WIOA requirements and the desired outcomes that would improve employment services for people with disabilities. The SRC also began to assess how BRS could incorporate changes that would help the VR program successfully meet these new goals.

#### **Agency Update**

David Doukas became the new Director for BRS on August 21, 2015. He will attend SRC meetings and provide members with information and updates about the VR program. The SRC looks forward to working with Mr. Doukas to continue to improve the quality of services for people in the program.

#### **BRS Public Meetings**

Due to WIOA, the deadline for the submission of the next State Plan was changed to March, 2016. As part of the focus for the public meeting is to review the State Plan, BRS and the SRC will host public meetings in January/February. Consumers, their families, and others interested in the VR program will be invited to review the draft of the 2017 Unified State Plan that features VR program specific information and employment information and goals among the state partners, as established by WIOA. Their feedback will inform the final version of the Unified State Plan.

#### **Consumer Survey**

In response to the SRC's goal to assess the effectiveness and delivery of VR services provided by BRS, the SRC collaborated with BRS to commission the Center for Public Policy and Social Research (CPPSR) at Central Connecticut State University (CCSU) to conduct a consumer satisfaction survey of VR recipients for fiscal year 2015. The purpose of this survey is to evaluate the job search services that consumers/participants received from the VR program at BRS.

Two-hundred and three consumer interviews were conducted from August 10<sup>th</sup> through September 24<sup>th</sup>, 2015. The construction of the survey instrument was a collaborative effort between the SRC, BRS and CPPSR. The list of consumers from which this survey data is drawn was provided by BRS. That list of 600 individuals represents a small sampling of the 8,672 current and former VR consumers that BRS served in fiscal year 2015. Consumer names were pulled from all regions.

Of the 600 consumer names provided for the survey, 75 individuals chose not to respond to the survey and 88 individuals could not be reached due to an out-of-service number, an inaccurate number, or use of a privacy device. Three individuals were either deceased or incarcerated, while six others had language barriers. The remaining 225 consumers did not answer the phone following numerous attempts, throughout multiple days and evenings. CPPSR called each consumer a minimum of seven times, though in most cases, attempts reached upwards of ten calls.

Out of the respondents who CPPSR was able to reach, this survey has a 6% margin of error at the 95% confidence interval. This means that statistical differences outside of the +/- 6% margin of error will only exist approximately 5% of the time.

CPPSR conducted the survey over the phone and recorded consumer answers exactly as stated. The CPPSR collected two forms of data:

- Qualitative: Participant comments, recorded and reported verbatim.
- Quantitative: Participant responses utilizing one of the provided answer options.

You may go to the BRS Website <a href="http://www.ct.gov/brs/site/default.asp">http://www.ct.gov/brs/site/default.asp</a> to see the full report. Based on the SRC review of the consumer survey, the SRC recommends that BRS strengthen communication between counselors and consumers, especially when consumer cases are being transferred to another counselor. It also recommends that BRS increase engagement with businesses to increase hiring of VR consumers.

#### **SRC Recommendations to BRS**

Several of these recommendations appeared last year, but the SRC believes they are ongoing issues that warrant continued attention this year.

#### Recommendation 1 –

We support BRS as it seeks new locations to better serve VR consumers. We applaud efforts to insure better visibility of BRS offices. We continue to recommend that signage to enable optimum visibility be a priority of all offices. The SRC is requesting that updates on signage and access to all buildings continue to be provided at SRC meetings.

#### **BRS Response:**

The bureau continues to be very active in its endeavor to improve the physical locations of our offices. We have completed two critical re-location projects in the first quarter of FFY 2016 and are planning additional moves within this year. We agree that both exterior and interior signage at our offices could be improved and have been systematically working toward addressing this. In many locations municipal building codes, landlord issues and physical space itself limits our signage options, but efforts to maximize our visibility are to be made wherever possible.

#### **Recommendation 2 –**

The accessible parking in the Waterbury office is on a grade that makes it difficult for consumers who use wheelchairs to transfer out of and into vehicles. The SRC recommends that when the parking lines are repainted, the accessible spaces be moved further right where the grade is not difficult to maneuver.

#### **BRS** Response:

The bureau has been and will continue to work closely with the Connecticut Department of Administrative Services and the lessor of our Waterbury office related to the re-grading and expansion of the parking lot. We will continue to pursue improvement at this location, insure no issues are present at newly established locations and also address any additional issue that are identified at other existing office locations.

#### Recommendation 3 –

Some consumers are still confused upon arrival at offices shared with DSS. It would be beneficial to consumers and families if BRS expands the website to include pictures of offices and perhaps a virtual tour of each office so consumers will know where to park and what to expect when entering into the building.

#### **BRS Response:**

BRS continually updates website content, including information related to BRS offices. We will look into providing pictures of the locations. We will also update the directions to include parking and building entrance instructions.

The state of Connecticut is implementing a new website portal that we hope will be functional in 2016. Once this website is implemented we plan to provide user friendly and accessible information for the general public, which will include BRS office information in detail.

In addition, we will continue to utilize social media to provide outreach to consumers and the public to increase awareness of office locations and services.

#### **Recommendation 4 –**

The SRC recommends BRS strengthen communication between counselors and consumers, especially when consumer cases are being transferred to another counselor. We would like to know what BRS expects of staff regarding response time to consumer telephone calls and emails. We would also like to have reports on how staff is meeting that expectation. Also, what is the procedure to ensure consumer contact is not lost when cases are transferred to new counselors?

#### **BRS** Response:

The VR Supervisors oversee case transfers and will continue working on a resolution to this concern. Going forward, consumers can expect that within two weeks of requesting a transfer to another counselor and/or office they will be contacted by the new counselor (or his/her designee) to schedule an appointment. In the case of case transfers happening due to a caseload vacancy, consumers receive a letter as soon as the vacancy occurs with contact information to be used until the position is filled. Mechanisms for formally tracking transfer cases and yielding metrics related to response times will be investigated and, to the extent possible, developed.

#### Recommendation 5 –

The SRC has a continued interest in all of the state agency collaborative projects including the Department of Mental Health and Addiction Services (DMHAS)/BRS Agency Collaborative regarding services and employment options for consumers with psychiatric issues, the Department of Developmental Services (DDS)/BRS agency collaborative and the Bureau of Education Services for the Blind (BESB) and BRS collaborative. Please provide updates at the SRC meetings about any achievements that have been attained, the strategies that have been developed to improve outcomes, the training that is available to staff, and any activity that will occur as a result of BRS' attendance at the CSAVR conference.

#### **BRS Response:**

BRS continues to maintain Memoranda of Understanding/Agreement and active, robust partnerships with various state agencies. We are committed to routinely sharing information about these collaborations and will continue to do so.

#### **Recommendation 6 –**

The Business Committee will continue efforts to make presentations about BRS to businesses and chambers of commerce to help publicize the VR program. The committee would like to work closely with BRS to develop a brochure to distribute on these occasions. The SRC requests regular updates regarding new projects and initiatives that will benefit the business community.

#### **BRS** Response:

BRS supports the SRC in their reaching out to businesses and chambers of commerce to market our services. We have a variety of materials developed that are geared toward highlighting the benefits of

employers working with the VR program. We would be interested in presenting these materials to the SRC and developing any additional brochures that are determined necessary.

The bureau will also offer regular updates regarding initiatives and projects with the employment community at SRC meetings.

#### Recommendation 7 –

The SRC recommends that BRS increase engagement with businesses to increase hiring of VR consumers.

#### **BRS Response:**

BRS remains very committed to engaging with businesses. This is evident in BRS housing a business services unit, Connect-Ability Staffing, which is responsible for business outreach and development throughout Connecticut. BRS plans on expanding Connect-Ability Staffing's capacity for outreach in order to facilitate more connections with businesses and, ultimately, more employment opportunities for VR consumers.

- (a) <u>Request for Waiver of State-wideness.</u> When requesting a waiver of the statewideness requirement, the designated State unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:
  - (1) A local public agency will provide the non-Federal share of costs associated with the services to be provided in accordance with the waiver request;
  - (2) The designated State unit will approve each proposed service before it is put into effect; and
  - (3) Requirements of the VR services portion of the Unified or Combined State Plan will apply to the Services approved under the waiver.

The Bureau of Rehabilitation Services is not requesting a Waiver of State-wideness.

- (b) <u>Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce</u>

  <u>Development System.</u> Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:
  - (1) Federal, State, and local agencies and programs;
  - (2) State programs carried out under section 4 of the Assistive Technology Act of 1998;
  - (3) Programs carried out by the Under Secretary for Rural Development of the Department of Agriculture;
  - (4) Non-educational agencies serving out-of-school youth; and
  - (5) State use contracting programs

BRS has Memoranda of Agreement (MOA) and Memoranda of Understanding (MOU) with the following entities:

#### (1) Federal, State, and local agencies and programs:

- a) Social Security Administration: Information Exchange Agreement to receive data regarding consumers' work history.
- b) The Connecticut Department of Veterans' Affairs MOU enables collaboration of services for veterans.
- c) The Connecticut Distance Learning Consortium MOA enables BRS to create and host the Connect-Ability Distance Learning Initiative (DLI) which are free online e-learning modules for

job seekers with disabilities, employers, Community Rehabilitation Providers, vocational rehabilitation staff and others. Modules are accessible and some are available in Spanish or American Sign Language. BRS also uses the DLI as a training registration platform for staff trainings.

- d) The Department of Social Services (DSS) MOA enables DORS/BRS to receive select administrative supports and access to information systems, applications and networks from DSS. It also formalizes the transfer of funding to conduct Learning Disability evaluation services related to the collaboration in serving potentially eligible consumers receiving Temporary Assistance for Needy Families (TANF).
- e) The Mashantucket Pequot Tribal Nation (MPTN) MOU enables collaboration and coordination of vocational rehabilitation services.
- f) Through the Secure Jobs Connecticut Pilot, a Letter of Agreement enables BRS and the Departments of Education (SDE), Housing (DOH), Labor (DOL), and Social Services (DSS) to collaborate with the Community Foundation for Greater New Haven, the Connecticut Coalition to End Homelessness, the Connecticut Women's Education and Legal Fund, Fairfield County's Community Foundation, the Hartford Foundation for Public Giving, the Liberty Bank Foundation, the Melville Charitable Trust, the Office of Early Childhood, the Partnership for Strong Communities, the United Way of Greater New Haven, and the United Way of CT to end homelessness by 2015 for Veterans, 2016 for those experiencing chronic homelessness, and by 2022 for families with children and youth.
- g) BRS also has agreements with Central Connecticut State University and the University of Maine, Farmington to train student interns.

#### (2) State programs carried out under section 4 of the Assistive Technology Act of 1998:

The Connecticut Assistive Technology (AT) Act Program is housed within DORS along with BRS, therefore an MOA is not needed. The Program Director for the AT Act program serves in the role of AT Consultant to the VR program and a strong relationship has been established. The AT Act program operates an AT device lending service specifically for VR consumers. The Program Director provides AT demonstrations when needed and assists VR consumers in participating in reuse activities. Additionally, VR consumers are able to utilize the alternate financing program operated by the AT Act program to assist in paying for needed devices that the VR program may not be able to provide, such as vehicles, which can then be modified by the VR program.

The following are formal agreements that have been established to provide activities under section 4 of the AT Act:

- a) The State Education Resource Center (SERC) MOU enables SERC to expand newly established Assistive Technology (AT) Device Demonstration Center to primarily show educators and other school personnel about various AT devices.
- b) The Southern Connecticut State University MOA enables laptops and iPads with specific software to be loaned to CT K-12 schools for up to four months to allow students to try devices before they are purchased.

# (3) Programs carried out by the Under Secretary for Rural Development of the Department of Agriculture:

None.

(4) Non-educational agencies serving out-of-school youth:

None.

#### (5) State use contracting programs:

- a) The Office of the Attorney General MOA enables review and approval of Community Rehabilitation Providers (CRPs) contracts and legal representation at Administrative Hearings for consumers
- b) The Office of the State Comptroller MOU provides approval and processing of expenses for consumers and staff.

#### (d) Coordination with Education Officials. Describe:

- (1) The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of student with disabilities from school to the receipt of VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students.
- (2) Information on the formal interagency agreement with the State educational agency with respect to:
  - (A) consultation and technical assistance to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including VR services:
  - (B) transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs;
  - (C) roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services;
  - (D) procedures for outreach to and identification of students with disabilities who need transition services.

With the passage of WIOA, the BRS Transition Committee has collaborated with the State Department of Education (SDE) and a number of entities to implement pre-employment transition services including the Connecticut Transition Community of Practice, the North East Transition Group, Regional Transition Committee, Transition Task Force, Collaboration Across the Life Span, Education Transition Liaisons, Southern Connecticut State University Career Advisory Committee, CT-AHEAD/Higher Education Schools, the Department of Labor, and the Workforce Investments Boards.

Prior to initiation of pre-employment transition efforts, BRS had liaison counselors assigned to each high school to work directly with students and collaborate with education administrators to sign a referral protocol yearly. With implementation of WIOA, 10 VR counselors have been assigned to work exclusively with students with disabilities.

SDE and BRS have staff that serve on each other's advisory committees (Transition Task Force and BRS Transition Committee). Program staff attends common training regarding the Individualized Education Plan (IEP), secondary transition services and WIOA. SDE and BRS collaborated to develop a statewide CT Transition Community of Practice (COP) with a broad stakeholder base as a single portal for transition resource development, professional development, and interagency collaboration. SDE and BRS initiated statewide strategic planning with agencies, school districts, families and other stakeholders.

Information on the formal interagency agreement with the State Department of Education (SDE) includes the following:

- a) A Transition Coordinator position is co-funded to provide one-on-one meetings between students, VR counselors, secondary staff, and families. This coordinator also attends group meetings, transition fairs and trainings including Community of Practice (COP) and Education Transition Liaison meetings. She provides consultation and technical assistance to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including VR services.
- b) BRS and SDE jointly collaborate with school liaisons and secondary staff, students and families.
- c) The VR counselors assigned to provide pre-employment transition services will spend 100% of their time delivering these services; 100% of their salaries will be committed as well.
- d) Procedures for outreach will be identified and implemented through a comprehensive marketing and communication plan. The primary focus will be on marketing and promoting BRS pre-employment transition services to help implement WIOA changes in the VR program. This state wide approach will communicate a consistent VR message.
- (e) <u>Cooperative Agreements with Private Nonprofit Organizations</u>. Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service providers.

BRS has partnership agreements with several CRPs; we procure CRP services through Purchase of Service (POS) contracts.

Through a POS contract with the Connecticut Association for Human Services (CAHS), consumers who are 18 or older **and** are eligible for Social Security Benefits receive Individualized Financial Capability Coaching to improve their knowledge of finances.

(f) <u>Arrangements and Cooperative Agreements for the Provision of Supported Employment Services.</u>

Describe the designated State agency's efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable to individuals with the most significant disabilities, including youth with the most significant disabilities.

The bureau provides supported employment and extended services to consumers with significant disabilities, as appropriate. Bureau counselors work with each individual consumer to identify necessary services. In the process of developing an Individual Plan for Employment, the counselor and consumer make decisions about the need for supported employment or extended services. When the services are deemed necessary, the counselor and consumer identify a source of long-term funding and meet with a representative case manager, if appropriate. Once long-term supports are obtained, the plan can be executed. Supported employment and extended services are provided in partnership with our statewide network of Community Rehabilitation Programs (CRP). These arrangements are based on fee-for-service contracts. We use a series of strategies to accomplish the goals of supported or extended employment, including the following:

- The statewide Ongoing Employment Supports Committee is a resource for identifying supported employment funding opportunities on a case by case basis;
- Cooperative agreements with CRPs, One-Stop Centers and Independent Living Centers (ILCs) allow for additional employment supports through the Ticket to Work program; and

- The Interagency Employment Practice Improvement Collaborative for staff in BRS, the Department of Mental Health and Addiction Services (DMHAS), and CRPs is designed to increase successful employment outcomes to an underserved target population.
- (g) <u>Coordination with Employers.</u> Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:
  - (1) VR Services; and
  - (2) Transition services, including pre-employment transition services, for student and youth with disabilities.

VR Services: BRS employs a Business Services Unit, Connect-Ability (CA) Staffing Employment Consultants, which is responsible for employer outreach efforts across Connecticut. The CA Staffing Employment Consultants build relationships with employers to identify their workforce development needs. Through these mutually beneficial relationships, CA Staffing offers business services such as disability awareness trainings, candidate pre-screening, Working Interviews, On-the-Job Trainings and Industry Specific Training and Placement Programs. In turn, the CA Staffing Employment Consultants obtain real-time labor market information that is shared with Vocational Rehabilitation Counselors and participants of the vocational rehabilitation program as part of their career path exploration and decision making process. This dual-customer approach allows BRS to prepare VR consumers for long-term, sustained employment in a constantly evolving labor market.

Transition Services: BRS will procure transition services for students with disabilities that include placement with employers to participate in work-based learning experiences and work place readiness training, as defined in WIOA. The scope of services will include social skill development, independent living, and instruction in self-advocacy, peer mentoring and assistive technology. Upon graduation, Youth will benefit from transition services to prepare for, seek and maintain employment and secure supports needed to be successful.

- (h) <u>Interagency Cooperation.</u> Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:
  - (1) The State Medicaid plan under title XIX of the Social Security Act;
  - (2) The State agency responsible for providing services for individuals with developmental disabilities; and
  - (3) The State agency responsible for providing services for individuals with developmental disabilities; and
  - (4) The State agency responsible for providing mental health services.

The State Medicaid plan under Title XIX of the Social Security Act is a program operated by the Department of Social Services (DSS). For over 20 years until 2014, BRS functioned as a Designated State Unit with DSS serving as its Designated State Agency. As a result of this long-term relationship, BRS has a close working relationship with DSS programs such as TANF, the Medicaid Buy-In, and Money Follows the Person. We offer technical assistance through our Vocational Rehabilitation and Benefits Counseling programs. BRS intends to work with DSS to develop an agreement that formalizes these referral and service processes.

The Department of Developmental Services (DDS) MOU enables coordinated vocational employment services for people with intellectual disabilities to minimize overlap of resources.

The Department of Mental Health and Addiction Services (DMHAS) MOU enables BRS to staff counselors at Local Mental Health Authority (LMHA) locations.

The Department of Mental Health and Addiction Services (DMHAS) MOA enables BRS to partially fund a shared position to improve service delivery and collaboration for consumers of both programs.

- (i) <u>Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development.</u> Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:
  - (1) Data System on Personnel and Personnel Development
    - (A) Qualified Personnel Needs. Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs with respect to:
      - (i) The number of personnel who are employed by the State agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category;
      - (ii) The number of personnel currently needed by the State agency to provide VR services, broken down by personnel category; and
      - (iii)projections of the number of personnel, broken down by personnel category, who will be needed by the State agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.
    - (B) Personnel Development. Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:
      - (i) A list of the institutions of higher education in the State that are preparing VR professionals, by type of program;
      - (ii) The number of students enrolled at each of those institution, broken down by type of program; and
      - (iii)The number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.
  - (2) Plan for Recruitment, Preparation and Retention of Qualified Personnel. Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the designated State unit and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.
  - (3) Personnel Standards. Describe the State agency's policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) and to ensure that designated state unit professional and paraprofessional personnel are adequately trained and prepared, including:

- (A) Standards that are consistent with any national or State-approved or –recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services; and
- (B) The establishment and maintenance of education and experience requirements, to ensure that the personnel have a 21<sup>st</sup> century understanding of the evolving labor force and the needs of individuals with disabilities.
- (4) Staff Development. Describe the State agency's policies, procedures, and activities to ensure that, consistent with section 101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:
  - (A) A system of staff development for professionals and paraprofessionals within the designated State unit, particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; and
  - (B) Procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.
- (5) Personnel to Address Individual Communication Needs. Describe how the designated State Unit has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking-ability.
- (6) Coordination of Personnel Development Under the Individuals with Disabilities Education Act. As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

#### **Data System on Personnel and Personnel Development**

BRS maintains a computerized record system for personnel needs, resources, and training. In addition to this information, the bureau annually uses a caseload management program called System 7 and results of ongoing needs assessments to analyze personnel needs.

BRS assisted 8,672 consumers in Federal Fiscal Year (FFY) 2015. With 77 VR counselors, the ratio of VR counselors to all consumers is 1:113; the ratio of VR supervisors to consumers is 1:964. The ratio of all staff to consumers is 1:65. Of the 8,672 total annual consumers, 3,002 developed an Individualized Plan for Employment (IPE). Based on the same number of VR counselors, the ratio of staff to all consumers with an IPE is 1:39; VR supervisors to consumers with an IPE is 1:334; and all staff to consumers with an IPE is 1:22.

The current and future personnel needs by personnel category are noted in the following chart:

<b>Personnel Category</b>	Total positions	<b>Current</b> vacancies	Projected vacancies over the next 5 years
Support (Administrative Assistant, Fiscal, Secretary)	34	2	6
Central Office Consultants	11	0	4
District Directors	3	1	1
Managers	3	0	0
VR Supervisors	9	0	2
VR Counselors	88	11	25

#### (B) Personnel Development

We analyze the graduate information from the regional Council on Rehabilitation Education (CORE)-accredited universities to find schools that offer required courses or graduate degrees in rehabilitation counseling. We also check with local CORE schools for the availability of distance learning opportunities for the required CSPD courses.

In the state of Connecticut, there is one CORE-accredited institution of higher education that is preparing vocational rehabilitation professionals: Central Connecticut State University (CCSU). All rehabilitation counseling graduates from this college will be eligible to sit for the Certified Rehabilitation Counselor (CRC) exam. Currently, there are 91 students enrolled in the CCSU program. There are 11 RSA scholars, with six expected to graduate. Last year, there were 25 graduates from the CCSU program.

#### (2) Plan for Recruitment, Preparation and Retention of Qualified Personnel.

BRS sends announcements for Counselor positions to all CORE-accredited institutions of higher education that train VR Counselors in the United States. We have initiated contacts with all CORE-accredited universities so that we can continue to find well-qualified staff for the vacancies we anticipate in the future. In addition to the Connecticut-based CORE institution listed above, we are in close contact with the regional institutions from which we have traditionally found Counselor applicants (Assumption and Springfield Colleges in MA, and Salve Regina in RI); we have staff that serve on advisory boards or teach at these institutions.

The bureau has recruited qualified staff representative of the population of Connecticut: the 32% diversity of our staff exceeds the 22% diversity of our state. We have recruited 11% of our staff from individuals that have disabilities. Our primary challenge has been finding Master's level counselors who are proficient with Spanish or American Sign Language (ASL). We will continue the following steps to ensure there is a sufficient pool of qualified counselors for future openings:

- increase our on-campus college recruitments;
- increase presentations to high school students. Inner-city high schools with increased percentages of minority students will be targeted to generate interest in rehabilitation counseling as a vocation:
- increase the number of consumers we help to go into the rehabilitation counseling profession; and

• increase recruitment, including media that serve diverse populations, and continue online nationwide recruitment.

In Connecticut, there are several factors that ensure retention of staff. The majority of staff leaves because of retirement or choosing to stay home with children rather than leaving for another position. BRS attributes the reasons for retention success as follows:

- BRS recruits staff that is committed to the importance of VR work;
- in-service training is available to staff at all levels;
- staff may give input into decisions that affect the way they work; and
- staff can participate in ongoing committees: Staff Training, Regional Training, Community Rehabilitation Providers, Transition, Autism Spectrum, and the BRS Annual Meeting.

The committees ensure that staff have input into the work of the bureau. The committees also give staff opportunities for leadership experiences that will help them prepare for other positions in BRS.

BRS offers staff an opportunity to create Individual Staff Development Plans (ISDP) to identify areas of an employee's current job that need further development, areas that could be developed to prepare for a future job in the agency, and training needed for either. ISDPs encourage staff to pursue areas of their strength and interest. This activity helps to identify staff training needs and prepares staff for growth needed to meet future succession challenges.

#### (3) Personnel Standards.

The current requirements for CSPD are based on the national standards for Certified Rehabilitation Counselors. The national standard is determined by the Commission on Rehabilitation Counselor Certification (CRCC). BRS hires counselors that meet the following:

- 1. Master's in Rehabilitation Counseling from a CORE-accredited institution; or
- 2. Master's and current Certified Rehabilitation Counselor (CRC) certification; or
- 3. Master's in Counseling with one integrated or two separate graduate level courses with the primary focus on the Theories and Techniques of Counseling course (-s) as part of the required curriculum; or
- 4. Master's, Specialist, or Doctoral degree in one of 13 qualifying majors (as specified by CRCC) granted from a college or university accredited by a recognized regional accrediting body at the time the degree was conferred.

BRS will pay for and require the following graduate courses for new counselors in permanent positions with a Master's in Counseling as described in 3 or 4 above. The number of additional required courses will depend on the previous education of the new employee as well as total months of vocational rehabilitation counseling experience. The bureau's definition of education, course curriculum, and experience is based on current standards for the national Certified Rehabilitation Counselor certification:

- 60 months of vocational counseling experience accepted by the credentialing committee no additional courses are required. CSPD requirements are met.
- Individuals with less than 60 months of vocational counseling experience will be required to take up to nine additional courses, based on a review of the graduate transcript. These specific required courses are determined by CRCC as Theories of Counseling, Techniques of Counseling, Foundations of Rehabilitation Counseling, Assessment, Occupational Information or Job

Placement, Medical Aspects of Disability, Psychosocial Aspects of Disability, Multicultural Issues, and Case Management and Rehabilitation Services.

Even though BRS bases its educational standards for VR Counselors on the national standards for Certified Rehabilitation Counselors, it does not require counselors to have CRC certification. However, applicants with a CORE-accredited rehabilitation Master's degree should be able to sit for the CRC exam.

BRS employees interested in CRC certification are encouraged to contact the Commission on Rehabilitation Counselor Certification at the following website: http://www.crccertification.com/ for more specific information on their credentials and experience. BRS does not guarantee that the above criteria will entitle a counselor to sit for the CRC exam. The bureau provides training at no cost, and offers Continuing Education Units (CEU's), which will count toward the ongoing training requirements by CRC.

In addition to education requirements, BRS encourages staff to pursue certification in their field. The bureau embraces the CSPD process to ensure a 21st century understanding of the evolving labor force and the needs of individuals with disabilities; continuous organizational development, and, continuous improvement of the competencies of all staff.

BRS also seeks continuous improvements in service delivery, the continuation of a professional level VR staff that can consistently achieve quality employment outcomes as specified in the Rehabilitation Act and promised in the Americans with Disabilities Act. In addition, we continually seek ways to meet the needs of our consumers and deliver a complete array of services based on the goals of employment, community participation, and informed consumer choice. The bureau has hired a qualified, diverse, flexible and progressive rehabilitation staff to serve our current and future consumers. BRS strives toward the continuous development of desired consumer outcomes: sustained jobs, jobs with future growth, and jobs with sufficient earnings.

#### (4) Staff Development.

BRS systematically provides adequate and ongoing training to staff. In-service training addresses assessment, vocational counseling, and job placement. All staff development activities support the bureau's mission to increase the quality of services and the number and quality of employment outcomes for people with disabilities. In-service training is available to all staff.

The bureau bases its plan for staff development on a multi-faceted comprehensive needs survey. BRS uses all available information for ongoing analysis of training needs including the following:

- Public Meetings (most recent data);
- Comprehensive Statewide Needs Assessment results;
- Rehabilitation Services Administration (RSA) 107 Review;
- Key training personnel collaboration with TACE (Technical Assistance and Continuing Education), Region 1 staff;
- Management reports; and
- Manager, district director, consultant, and supervisor feedback.

In addition to ensuring that staff meets CSPD requirements, BRS provides Foundations of CT VR, a year-long series of in-service training that is mandatory for new staff and available for staff that need

refresher training. This includes a broad array of topics pertaining to VR such as: core BRS policies and practices, trainings on the specific populations, independent living, transition, and community rehabilitation services. A variety of training methods are utilized to assure that training activities are diverse enough to address individual learning styles.

Training is provided on assistive technology. BRS helped create and is a member of the NEAT (New England Assistive Technology) Center at Oak Hill. The Center is the largest assistive technology (AT) center in Connecticut where one can try AT devices for personal use, observe AT device demonstrations, donate or buy used equipment that is refurbished and recycled, obtain loans of AT devices and receive training on the latest adaptive equipment.

The Connecticut Tech Act Project director provides training and consultation for BRS staff. Other inservice trainings on specific disability populations contain information on technological solutions for consumers.

BRS continually analyzes all consumer data to identify areas where it needs to increase training or vary approaches. Acquired updated information and research is disseminated to all BRS staff by Central Office staff.

#### (5) Personnel to Address Individual Communication Needs.

BRS addresses individual communication needs of applicants for, and recipients of, services through the services of others able to communicate in alternate languages, appropriate modes, or in native languages. Approximately 10% of the current staff is bilingual in English and Spanish. The bureau employs staff who speak other languages as well as staff who use both American Sign Language (ASL) and English. The BRS website publishes all languages that staff speaks in all three regions. The list below indicates the languages spoken by current staff and the regions in which they work:

- American Sign Language (ASL) Northern, Southern, Western
- French Northern
- French Italian Southern
- Polish Northern
- Portuguese Northern
- Spanish Northern, Southern, Western

BRS can also hire interpreters in most languages and can access interpreter services over the phone for all languages.

Each district has Rehabilitation Counselors for the Deaf (RCD) on staff to work with individuals who are deaf or hard of hearing. These counselors are equipped with video phones. The bureau hires full-time Interpreter Assistants for its RCDs who are in need of this accommodation. BRS also contracts interpreter services through the DORS Interpreting Unit and LifeBridge Community Services.

The bureau does not serve many consumers who use Braille since there is a public Vocational Rehabilitation program through the Connecticut Bureau of Education and Services for the Blind (BESB) that serves the majority of consumers who have visual disabilities. When needed, BRS can provide Braille materials for consumers or staff. The bureau's goal is to provide any communication support necessary for staff or consumers with disabilities.

### (6) Coordination of Personnel Development Under the Individuals with Disabilities Education Act.

BRS co-funds an Education Consultant position with the Connecticut State Department of Education's Bureau of Special Education who has been active in the Department of Education's Comprehensive System of Personnel Development Council. The bureau routinely plans training with input from the Consultant in the co-funded position. This Consultant provides annual training for all bureau professional staff on Transition and other provisions of the IDEA. The Consultant also meets with the management team of BRS semi-annually to review current collaborative training and other provisions of the IDEA. This collaboration allows for coordination of the bureau's human resource plan and personnel development under the IDEA.

#### (j) Statewide Assessment.

- (1) Provide an assessment of the rehabilitation needs of individuals with disabilities residing within the State, particularly the VR services needs of those:
  - (A) with the most significant disabilities, including their need for supported employment services:
  - (B) who are minorities;
  - (C) who have been unserved or underserved by the VR program;
  - (D) who have been served through other components of the statewide workforce development system; and
  - (E) who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.
- (2) Identify the need to establish, develop, or improve community rehabilitation programs within the State; and
- (3) Include an assessment of the needs of individuals with disabilities for transition career services and pre-employment transition services, and the extent to which such services are coordinated with transition services provided under the Individuals with Disabilities Education Act.

In 2013, BRS completed a Comprehensive Statewide Needs Assessment (CSNA) that examined the needs of individuals with the most significant disabilities, who are minorities, who have been unserved or underserved by the VR program and who are served through other components of the statewide workforce investment system. The CSNA also assessed the need to improve community rehabilitation programs within the state. To complete the CSNA, community rehabilitation providers (CRPs), BRS counselors, consumers and key informants were surveyed. BRS also surveyed staff in 2013 to examine cultural competence as it relates to service delivery to minority consumers as an unserved/underserved population. In addition, relevant findings from the 2011 Medicaid Infrastructure Grant Needs Assessment including an employer survey were also reviewed.

The results of this review led to the following recommendations:

- Increase system efficiency and effectiveness;
- Increase communication and education about the nature and availability of vocational rehabilitation services;
- Focus attention on underserved consumers with hearing disabilities or autism;
- Improve cultural competency among BRS counselors and CRPs;
- Develop more effective relationships with employers; and
- Identify sources to overcome transportation barriers.

In 2015, the SRC and BRS collaborated to conduct a small survey to assess consumer satisfaction with job search services VR recipients had received during the year. As a result of this survey, the SRC recommends that BRS strengthen communication between counselors and consumers, especially when consumer cases are being transferred to another counselor. It also recommends that BRS increase engagement with businesses to increase hiring of VR consumers.

While BRS has accomplished great strides in delivering VR services effectively, the recommendations identified in these assessments offer additional goals that support the VR program as it continues helping individuals with disabilities achieve optimal employment outcomes.

There are several areas of need to improve CRP services:

- capacity to serve underserved populations;
- quality of CRP staff; and
- quality of service delivery.

BRS continually seeks CRP agencies that are able to meet the demand of serving the underserved populations, specifically Deaf and Hard of Hearing and Spanish speaking individuals. In the past, several attempts were made to encourage agencies to hire staff that is qualified to serve these individuals. The bureau created a rate differential and offered technical assistance to CRPs who wanted to expand services to these populations. Although a small number of agencies utilized these incentives, the attempt did not increase enough to meet the bureau's needs.

Additionally, the CRP agencies continue to be challenged with hiring and retaining experienced staff to perform the core services. The bureau has put substantial emphasis on training opportunities for CRPs to help them and to strengthen the relationship with the VR counselors and the CRP staff.

BRS is currently focusing on improving its ability to develop an Individualized Plan for Employment (IPE) for transition students within the 90-day deadline set by the Rehabilitation Services Administration (RSA). WIOA has established new requirements for transition services. BRS has assessed and determined the following needs of individuals with disabilities for transition career services and pre-employment transition services which include coordination with transition services under Individuals with Disabilities Education Act (IDEA):

- (1) Continue to focus on decreasing the time in which IPEs are developed for transition students.
- (2) Improve post-secondary school outcomes for students with disabilities ages 16-21.
- (3) Maintain a Memorandum of Agreement that enables joint funding for SDE/BRS consultant position to coordinate transition services as outlined under IDEA.
- (4) Design and implement a pre-employment transition service delivery model to meet the WIOA requirements.
- (5) Educate community rehabilitation providers and school systems regarding preemployment transition services.
- (6) Strengthen partnerships with education stakeholders.
- (7) Improve outreach to students, their families and school systems.
- (8) Update and expand website resources and information.

#### (k) Annual Estimates.

#### Describe:

- (1) The number of individuals in the State who are eligible for services.
- (2) The number of eligible individuals who will receive services under:
  - (A) The VR Program;
  - (B) The Supported Employment Program; and
  - (C) each priority category, if under an order of selection.
- (3) The number of individuals who are eligible for VR services, but are not receiving such services due to an order of selection; and
- (4) The cost of services for the number of individuals estimated to be eligible for services. If under an order of selection, identify the cost of services for each priority category.

According to the most recent US Census Bureau American Community Survey, Connecticut had 3,526,628 residents who were non-institutionalized in 2013. There were 2,226,234 persons between 18-64 years of age. 8.2% or 182,889 of these individuals had a disability (+/- 0.3 margin of error). Data from the 2013 Census also shows that Connecticut had 350,537 non-institutionalized persons with disabilities ages 16 and over, and of that number 24.5% were employed. The remaining 75.5% were unemployed.

These statistics indicate that a considerable number of persons with disabilities in the State of Connecticut are not working. A measurable number of these individuals may be transition-aged youth. In addition, a portion of 24.5% of persons with disabilities who are employed may be underemployed. Some of these individuals may also require services to attain or retain employment consistent with their strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice. BRS is not currently in an Order of Selection. Potentially, the vocational rehabilitation program would be available to all consumers with disabilities.

These statistics make it difficult, if not impossible, to accurately estimate the number of potentially eligible consumers of VR services. That number is many times more than BRS has historically served or has the resources to serve.

#### State Estimate of the Number of Individuals to be Served Under this Plan

For Federal Fiscal Year (FFY) 2015, BRS has served 5,443 eligible consumers in Individual Plans for Employment (IPEs) under Part B of Title I of the Rehabilitation Act. This is a 12.6% increase from FFY 2014, when 4,834 consumers received services in IPEs under Part B of Title I of the Rehabilitation Act.

BRS has remained committed to the ongoing recruitment, retention, and development of its counseling staff with qualified professionals. In FFY 2013 and 2014, BRS experienced an unexpected increase of short-term vacancies which directly impacted its ability to serve consumers. In 2014 the total number of consumers served was down 3.1% from FFY 2013. During FFY 2015 BRS enjoyed a somewhat healthier staffing pattern despite some continued attrition and short-term leaves. This improvement in staffing along with the agency's focus on training and development has resulted in increased caseload sizes as well as an overall increased capacity to serve consumers in Individual Plans for Employment (IPEs).

BRS has also been engaged in a statewide effort to improve the timeliness of plan development for its transition-aged youth. This has included training, guidance, increased monitoring, as well as a quality assurance review process for transition cases. With these efforts, the bureau has realized improvements in the number of transition plans written as well as a reduction in the timeframes for plan development. For FFY 2015, BRS was able to write 70% of plans for transition-age youth in three months or less.

As BRS begins to implement new policies and procedures related to the Workforce Innovation and Opportunity Act (WIOA) legislation, it is anticipated that counseling staff will experience increased referrals of Pre-Employment Transition Service (PETS) consumers, transition-age youth, and consumers from our partner programs. Based on these projected increases, the bureau expects to serve 5,944 eligible consumers in Individual Plans for Employment (IPEs) under Part B of Title I of the Rehabilitation Act in FFY 2017; an increase of 9% above FFY 2015.

#### **Supported Employment**

During FFY 2014, BRS purchased services for 142 consumers eligible for Supported Employment funding under Title VI-B of the Rehabilitation Act, utilizing \$301,706. It was projected that BRS would serve 84 consumers with Title VI-B funds with an estimated expenditure of \$204,980. The significant increase from projections was the result of the agency's continued focus on proper identification of supported employment cases and a commitment to properly expend funding.

In FFY 2015, BRS has purchased services for 136 individuals, expending \$278,551 in Title VI-B funds. These numbers are consistent with FFY 2014 performance. In combination with the 5,443 individuals who received services under Title I, BRS served a total of 5,579 individuals in FFY 2015.

For FFY 2017, the bureau anticipates that 150 individuals could potentially receive services funded under Title VI-B. In combination with the 5,944 individuals projected to receive services under Title I, the total number of individuals who could be served in IPE's during FFY 2017 is 6,094.

#### **Costs of Services**

Total Title I purchase of services (POS) costs for all eligible consumers in FFY 2015 was \$14 million. This figure represents a \$2.2M increase over FFY 2014 expenditures. The bureau believes that two key contributing factors exist. First, BRS saw significant increases with the number of consumers applying for services, going into Individualized Employment Plans (IPEs), and receiving paid services in FFY 2015. Secondly, a significant number of transition-aged youth were funded to participate in a Summer Youth Employment Program (SYEP). The utilization of the SYEP was expanded to allow increased access with emphasis on Pre-Employment Transition (PET) consumers.

Upon examining expenditure trends in POS for non-Pre-Employment Transition consumers determined to be Priority 1 and Priority 2, as well as allowing for a potentially modest expansion of costs in providing services for individuals of Priority 3 status, BRS projects to expend approximately \$11.5 million in FFY 2017 on this group of consumers. In addition, BRS will expend a minimum of \$2.5 million purchasing Pre-Employment Transition Services. Thus the total POS projection for FFY 2017 is \$14M.

With respect to the 150 consumers projected to receive services under Title VI-B during FFY 2017, the bureau forecasts an expenditure of \$269,167 in Supported Employment funding.

Category	Title I or Title VI	Estimated Funds	Estimated Number to be Served	Average Cost of Services
All Eligible Consumers	Title I	\$14,000,000	5,944	\$2,355
Most Significant	Title VI	\$269,167	150	\$1,794
Totals		\$14,269,167	6,094	\$2,342

#### (l) <u>State Goals and Priorities</u>. The designated State unit must:

- (1) Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions.
- (2) Identify the goals and priorities in carrying out the VR and Supported Employment programs.
- (3) Ensure that the goals and priorities are based on an analysis of the following areas:
  - (A) the most recent comprehensive statewide assessment, including any updates;
  - (B) the State's performance under the performance accountability measures of section 116 of WIOA; and
  - (C) other available information on the operation and effectiveness of the VR program, including any reports received from the State Rehabilitation Council and findings and recommendations from monitoring activities conducted under section 107.

#### **Goals and Priorities**

The bureau, in collaboration with the State Rehabilitation Council (SRC), conducted a comprehensive assessment of the rehabilitation needs of people with disabilities and identified four major goal areas. These goals and priorities will be used to carry out the Supported Employment and Vocational Rehabilitation programs. The SRC jointly agrees with BRS on these goals and priorities for the coming year.

Each of the goal areas contains a set of priority areas that the bureau could address in the coming year. We cannot address every issue identified as a need, but attempted to build goals broad enough to address the major themes. Four priority areas were chosen based on their frequency of occurrence in the assessment. One additional goal was developed to address implementation of WIOA.

**Goal 1:** To implement the provisions of WIOA specific to the VR program.

#### Priority areas:

- pre-employment transition services
- employer services
- service delivery
- performance accountability measures
- subminimum wage

**Goal 2:** To improve the quality of vocational rehabilitation services for individuals with disabilities.

#### *Priority areas:*

- customer service and provision of information
- ongoing skill development
- use of social media
- provision of information on resources, labor market information and training/education programs

**Goal 3:** To increase employment outcomes for individuals with disabilities, particularly those individuals from unserved or underserved populations.

#### Priority areas:

- individuals from minority backgrounds
- young adults with disabilities
- individuals with psychiatric disability
- individuals with autism spectrum disorders

**Goal 4:** To increase access to services for all individuals with disabilities.

#### *Priority areas:*

- services for individuals who are Deaf/Hard of Hearing
- services for individuals whose primary language is Spanish
- cultural competencies for staff

**Goal 5:** To create effective partnerships designed to advance employment for Connecticut citizens with disabilities.

#### *Priority areas:*

- businesses
- Community Rehabilitation Providers
- state agencies with a specific emphasis on core WIOA partners

These broad goals are intended to be five-year goals, with the priority areas being flexible enough to change from year to year if necessary.

#### (m) Order of Selection. Describe:

- (1) The order to be followed in selecting eligible individuals to be provided VR services.
- (2) The justification for the order.
- (3) The service and outcome goals.
- (4) The time within which these goals may be achieved for individuals in each priority category within the order.
- (5) How individuals with the most significant disabilities are selected for services before all other individuals with disabilities; and

(6) If the designated State unit has elected to serve eligible individuals, regardless of any established order of selection, who require specific services or equipment to maintain employment.

BRS is not currently in an Order of Selection.

#### (n) Goals and Plans for Distribution of title VI Funds.

(1) Specify the State's goals and priorities for funds received under section 603 of the Rehabilitation Act for the provision of supported employment services.

BRS will continue to use supported employment Title VI, Part B funds to allow maximum options in providing services to meet individual consumer needs. The bureau will target service to those persons who are presently not served or are underserved, and who:

- Are individuals with the most significant disabilities and who have previously been unable to maintain competitive employment due to the severity of their disabilities;
- Are in need of ongoing support for the duration of their employment; and
- Will have extended support services available beyond BRS time-limited services.
- (2) Describe the activities to be conducted, with funds reserved pursuant to section 603(d), for youth with the most significant disabilities, including:
  - (A) the provision of extended services for a period not to exceed 4 years; and
  - (B) how the State will leverage other public and private funds to increase resources for extended services and expanded supported employment opportunities for youth with the most significant disabilities.

BRS maintains that given the proper supports, the majority of persons with disabilities, including those individuals with the most significant disabilities, are capable of maintaining competitive employment. Supported employment services are available to individuals with the most significant disabilities who have been unable to maintain competitive employment because of the severity of their disabilities. The goal is to assist these individuals to achieve employment in the most integrated setting possible. Services will be provided on an individual case basis with emphasis on methods that provide maximum integration and consumer-informed choice. Therefore, BRS will continue to focus on placing consumers in individual placements with maximum integration.

The Rehabilitation Act Amendments of 1992 Supported Employment definition emphasizes "competitive work in an integrated employment setting for persons with the most severe disabilities for whom competitive employment has not traditionally occurred or for whom competitive employment has been interrupted or intermittent as a result of a significant disability and who, because of the severity of the disability, need intensive support services or extended services in order to perform such work, inclusive of transitional employment for persons with the most severe disabilities due to mental illness."

The new WIOA changes the way Supported Employment and Extended services will be delivered:

#### Supported Employment

• Extension of SE services timeframe from 18 to 24 months

• The 50% of SE funds applies to all Youth, which includes Pre-employment Training Services (PETS).

#### **Extended Services**

- Services can be provided for a period of up to/but not to exceed four years to youth with the most significant disabilities expending supported employment Title VI funds.
- Prior to WIOA, these services not previously permitted for youth with disabilities under VR program or Supported Employment program.

For Supported Employment services, BRS will provide statewide training for all staff to support and empower counselors in making a shift towards more efficient plan development; in particular moving students with disabilities to plan (VR) while still exploring the potential need for Ongoing Supports.

- As the need for SE is established and funding identified for ongoing support, VR plans can be amended to Supported Employment Plans.
- Utilization of short term plans as a means towards assuring better opportunities for transitioning youth who are expected to be in our system for longer periods of time

For Transition to Extended Services, BRS will work with relevant state agencies, private non-profit organizations and our other partners to transition consumers from Title VI, Part B funding to the identified provider of the ongoing, long-term support funding as soon as the funding is available and transition is appropriate. Use of Title VI, Part B funds will vary, based on the needs of the individual consumer, but will generally not exceed 24 months in length.

#### Transition to Extended Services.

As with all bureau services, Supported Employment is designed and provided based on the individual needs of the consumer. BRS will work with relevant state agencies, private non-profit organizations and our other partners to transition consumers from Title VI, Part B funding to the identified provider of the ongoing, long-term support funding as soon as the funding is available and transition is appropriate. Use of Title VI, Part B funds will vary, based on the needs of the individual consumer, but will generally not exceed 24 months in length.

#### Coordination and Collaboration

BRS oversees one of the three state-funded long-term supports programs. The bureau is engaged in facilitating systemic changes in how supported employment services are delivered in the community. The bureau works with relevant state agencies, private non-profit organizations and other partners to transition consumers from the Title VI, Part B funding to an appropriate ongoing employment support program. These efforts have led to internal and external improvements in our state system and have built a foundation for a strong Supported Employment service program in this state.

- (o) <u>State's Strategies</u>. Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):
  - (1) The methods to be used to expand and improve services to individuals with disabilities.

BRS will use the following objectives to expand and improve services to individuals with disabilities:

- Work with WIOA core partners to ensure that individuals with disabilities are effectively supported in the newly designed state employment system.
- Implement its strategic plan for delivering pre-employment transition services.
- Focus on timely progress through each step of the case management process.
- Maintain a dedicated staff resource to manage the agency's training program and will
  maintain a separate training line within the agency budget that equals the level of funds
  available under WIA.
- Continue to use social media to connect job seekers with opportunities to pursue jobs with employers.
- Develop materials on resources, labor market information and training/education programs to
  post on the BRS and Connect-Ability websites to provide consumers consistent access to
  information.
- Continue to dedicate a specific unit of VR staff to support employers as dual customers to create more business partnerships and more employment opportunities through direct job placement, the use of On-the-Job (OJT) Trainings and Industry Specific Training and Placement Programs (ISTPPs).
- Participate in cross agency trainings through the Association of People Supporting Employment First (APSE) to strengthen state agency partnerships.
- Continue to develop and disseminated Distance Learning Modules for staff and consumer use.
- (2) How a broad range of assistive technology services and devices will be provided to individuals with disabilities at each stage of the rehabilitation process and on a statewide basis.

BRS makes Assistive Technology (AT) available to individuals with disabilities through collaboration with the Connecticut Tech Act Project (Connecticut's statewide assistive technology program) throughout the rehabilitation process across the state in the following ways:

- VR counselors may solicit the agency's Assistive Technology Consultant for guidance and assistance to ensure that AT devices and services are considered throughout the consumer's vocational rehabilitation process as appropriate.
- The AT consultant can conduct comprehensive AT evaluations with consumers and can provide training in the use of newly-acquired AT, as needed.
- Through the Assistive Technology Device Loan Program at BRS, VR consumers may borrow and try out devices to help them make informed decisions about whether the AT device is appropriate and if it will remove or reduce barriers, as expected. The inventory for this program includes a wide range of devices across the AT continuum from low to high tech, across disability categories (i.e.: hearing, vision, mobility, computer access, cognitive, communication, etc.), and across potential work environments.
- VR Counselors and the AT Consultant collaborate with other entities such as school systems, colleges/universities, employers, independent living centers, state Medicaid waiver programs, and insurance plans to facilitate the provision of AT devices and services.
- The AT consultant distributes an electronic newsletter and maintains a Tech Act website to provide information about AT trends for anyone interested in AT.

- The Connecticut Tech Act Project will host a biennial full day AT Conference with a focus on AT for employment, community living and education. The 2016 conference offers 12 to 15 sessions, hands on training with specific devices and up to 30 exhibitors.
- (3) The outreach procedures that will be used to identify and serve individuals with disabilities who are minorities, including those with the most significant disabilities, as well as those who have been unserved or underserved by the VR program.

BRS has targeted a number of ways to better serve minority and unserved/underserved consumers:

- Work with the bureau's Latino Committee to develop new approaches to working with consumers who are Latino. Members of the Latino Committee and representatives the Employment Consultants will attend each other's meetings for ongoing updates and dialogue.
- Produce all new publications in Spanish and pursue options to add required forms on the BRS Intranet for staff use.
- Implement pre-employment transition services.
- Translate distance learning modules into Spanish and American Sign Language.
- Continue to partner with Local Mental Health Authorities and the state Mental Health Department to increase the number of employment outcomes and amount of earnings for individuals with psychiatric disabilities.
- Hold three meetings of the Autism Spectrums Disorder (ASD) Committee to develop more responsive services for individual with autism spectrum disorders. Provide joint staff training for BRS and Department of Developmental Services (DDS) staff on Autism Services.
- Conduct targeted outreach to employers to increase employment outcomes for individuals
  who are deaf. BRS will continue to disseminate an Interview Preparedness Tip Sheet on
  Deaf Culture issues to stakeholders as needed.
- Provide opportunities to strengthen cultural competencies for staff.
- (4) The methods to be used to improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, postsecondary education, employment, and pre-employment transition services).

BRS will use the following methods to improve and expand VR services for students with disabilities:

- Align existing VR services with Pre-Employment Transition Services as defined in WIOA 2014.
- Serve students with disabilities ages 16-21 enrolled in high school by providing preemployment transition services from existing community rehabilitation providers, companies, community agencies, education entities, colleges and universities statewide.
- Assign 10 vocational rehabilitation (VR) counselors to school systems statewide to serve students enrolled in high school. Allocate 100% of their time and funding for serving students enrolled in high school.

- VR Counselors will improve partnerships with school systems to provide transition services to students.
- BRS will strengthen partnerships with State Department of Education, local school systems, community providers, higher education entities, other state agencies, and employers.
- Create and disseminate effective marketing and messaging to target school systems, students and their families to educate and inform them about the BRS shift in service delivery to students as outlined in WIOA regulations.
- BRS will continue to strengthen and broaden collaboration resources with employers, two
  and four year colleges and universities, workforce investment boards (WIBS)/American Job
  Centers and DOL grant training programs for students, youth and young adults with
  disabilities.

# (5) If applicable, plans for establishing, developing, or improving community rehabilitation programs within the State.

BRS will develop the capacity of Community Rehabilitation Providers (CRPs) to meet the needs of VR consumers in the following ways:

- Continue to conduct annual performance reviews on all CRPs to ensure quality service delivery.
- Meet quarterly with CRPs in each district.
- Provide opportunities for CRPs to meet statewide, both in targeted committee meetings and at an annual forum.
- Participate in the Job Development Leadership Network.
- Continue to disseminate Distance Learning Modules focused on service delivery and fiscal process for CRPs to interact with BRS.
- Increase the number of providers who will serve underserved populations, including Deaf and Hard of Hearing and Monolingual Spanish.
- Explore procurement opportunities for specialized services.

# (6) Strategies to improve the performance of the State with respect to the performance accountability measures under section 116 of WIOA.

BRS will work with the larger workforce investment system to set thresholds for the new WIOA performance accountability measures.

# (7) Strategies for assisting other components of the statewide workforce development system in assisting individuals with disabilities.

BRS is actively engaged in the implementation of WIOA in Connecticut with representatives on all planning committees. BRS assigned staff to participate on the four distinct planning committees to fully understand the changes WIOA would make and how VR services would be integrated:

- a. Administration/Governance development and maintenance of the MOU among state partner agencies and a regional MOU template.
- b. Technology, Data, Outcomes development of a strategy to use existing I.T. systems to obtain aggregate data on common customers and program outcomes.
- c. Service Design and Delivery development of strategies and models for the coordinated delivery of effective workforce system services.

d. Employer Engagement – development of a strategic plan to promote employer engagement in effective industry partnerships.

BRS will review the adequacy of existing Memoranda of Understandings with workforce boards and partners, and continue to attend workforce board meetings. BRS will also continue to seek a representative from the workforce board to serve as a member of the State Rehabilitation Council.

- (8) How the agency's strategies will be used to:
  - (A) achieve goals and priorities by the State, consistent with the comprehensive needs assessment;
  - (B) support innovation and expansion activities; and
  - (C) overcome identified barriers relating to equitable access to and participation of individuals with disabilities in the State VR Services Program and the State Supported Employment Services Program.

Along with the strategies mentioned above to address goals and ways to overcome barriers to equitable access to VR services, BRS also anticipates using innovation and expansion (I&E) funds in FFY 2017 to support the State Rehabilitation Council, the State Independent Living Council, and to continue Individualized Financial Capability Coaching, a project to increase financial literacy and capability for people with disabilities. Other proposals will be assessed upon submission and considered based on the alignment with the state's goals and priorities

#### (p) Evaluation and Reports of Progress: VR and Supported Employment Goals. Describe:

- (1) An evaluation of the extent to which the VR program goals described in the approved VR services portion of the Unified or Combined State Plan for the most recently completed program year were achieved. The evaluation must:
  - (A) Identify the strategies that contributed to the achievement of the goals.
  - (B) Describe the factors that impeded the achievement of the goals and priorities.

**Goal 1:** To improve the quality of vocational rehabilitation services for individuals with disabilities.

#### Priority areas:

- 1. Customer Service and Provision of Information
  - Both the BRS and Connect-Ability websites provide information related to VR services which are updated, as needed. Staff responsible for maintaining these websites anticipates the state of Connecticut will implement a new portal platform scheduled for 2016.
  - Response to Consumer Requests During FFY 2015, BRS responded to more than 600 inquiries for information through the BRS e-mail submissions.
- 2. Ongoing Skill Development

The bureau was awarded two five-year, in-service training grants covering October 1, 2010 – September 30, 2015. The In-Service Training Project identified two major goals:

- Goal I: To improve the skills of all BRS staff by providing training and development in vocational rehabilitation service provision, responsiveness to consumers, bureau mission and programs, awareness of state and community resources.
- Goal II: To improve recruitment and retention of BRS staff by providing career development and succession planning activities to assist counselors in defining appropriate career paths and to assist the bureau to maximize its resources, while continuing to meet CSPD requirements.

BRS provided Foundations of CT VR, a year-long series of in-service training that was mandatory for new staff and available for staff that desired refresher training. This included a broad array of topics pertaining to VR such as: Foundations of CT VR Training, trainings on specific populations, independent living, transition, and community rehabilitation services. A variety of training methods were utilized to assure that training activities were diverse enough to address individual learning styles.

The bureau developed an integrated program of training, education, and development activities for staff to gain the necessary skills, knowledge, and experiences to improve the quality of services and the number and quality of employment outcomes for people with disabilities. Our training project enhanced counselor knowledge of current VR practices and BRS policy.

Effective October 1, 2015, the bureau maintains the above practices, and will continue them as long as funding is available. BRS will also maintain a dedicated staff resource to manage the agency's training program and will maintain a separate training line within the agency budget that equals the level of funds available under WIA.

#### 3. Social Media

Job seekers, employers, advocates and providers use social media to communicate and network. In order to keep pace with technological advancements, BRS added the use of Social Media as a form of communication to help consumers gain access and become familiar with online job information. BRS formed a Social Media Committee that continues to meet regularly to oversee the agency's social media activities. The committee developed social media policy and guidance that was the basis for staff training. BRS has a presence on Facebook, LinkedIn and Twitter. Staff is encouraged to have a presence on these platforms for work-related activity only. Staff may assist consumers in developing a presence on these platforms to access information from BRS and employment information and opportunities. Consumers may be referred to the Department of Labor for LinkedIn training as well.

For federal fiscal year 2015, BRS social media activity reports the following:

- a) Facebook Analytics reports we have 21 followers; this number is not enough to report residual posts from our original posts.
- b) LinkedIn Analytics reports we have 193 "Connections." BRS also used LinkedIn to post job announcements which garnered 389 views and 50 applicants.
- c) Twitter Analytics reports that we have 133 followers that have enabled BRS to reach 43,992 Twitter users via tweets about the VR program and services, job openings and disability related information.

**Goal 2:** To increase employment outcomes for individuals with disabilities, particularly those individuals from unserved or underserved populations.

Priority areas:

1. Individuals from Minority Backgrounds

BRS initiated a Request for Applications from qualified Community Rehabilitation Providers to procure Summer Youth Employment Program (SYEP) services in an effort to give youth in high school and young adults out of school an opportunity to have summer work experiences. Particular emphasis in the procurement application was placed on serving young adults who are in the priority areas of underserved populations, including Deaf and Hard of Hearing, Monolingual Spanish speaking, Individuals with Autism and young adults with psychiatric disabilities. The procurements were awarded to agencies that would be able to serve specific geographical areas and took into account the underserved populations in those areas. The results of the procurement produced a small set of CRPs who were able to serve the capacity.

The SYEP provided work experiences to a significant number of young adults, both in school and out of school. These young adults were given the opportunity to be better prepared to gain employment, giving them work related experiences for resume building.

Training: BRS provided the following training to improve employment outcomes for unserved or underserved populations:

- Deaf Culture different communication methods of persons who are deaf;
- Understanding Team and a Diversified Workforce communicating appropriately with and about different groups of people;
- Ethics and Multicultural Counseling Competency cultural issues in counseling; and
- Using the Myers-Briggs and Strong Inventories in VR using these inventories in career counseling.
- BRS also offered World of Work Inventory that provides tools for staff to use to accommodate consumers who have different levels of English, consumers with hearing loss, consumers who are visually impaired and Spanish-speaking consumers.

As a result of these efforts BRS assisted 565 Individuals from Minority Backgrounds achieve successful employment outcomes. This represents a 66% increase over FFY 2014.

#### 2. Young Adults with Disabilities

BRS has met quarterly with SDE and representatives from the Regional Education Service Centers (RESCs) to continue providing current transition information. This group now includes the Department of Developmental Services Education Liaisons and Transition Consultants.

BRS, SDE and the CT Transition Community of Practice (CT COP) have now partnered with the IDEA National Transition Community of Practice. This partnership established a Connecticut presence on the SharedWork website. It also established a core team of stakeholders and initial practice groups that include the BRS Transition Committee and the SDE Transition Task Force. BRS continues to work with the website committee on transition resources for all stakeholders. The CT COP has adopted the National Collaborative on Workforce and Disability (NCWD) Guideposts for Success as a framework for secondary transition activities and information. This is the same framework BRS has used for Transition since 2010.

As a result of these efforts BRS assisted 311 Young Adults with Disabilities achieve successful employment outcomes. This represents a 3% increase over FFY 2014.

#### 3. Individuals with Psychiatric Disability

BRS continues to partner with Local Mental Health Authorities and the state Mental Health agency to increase the number of employment outcomes and amount of earnings for individuals with psychiatric disabilities.

As a result of these efforts BRS assisted 310 Individuals with Psychiatric Disabilities achieve successful employment outcomes. This represents a 23% increase over FFY 2014.

#### 4. Individuals with Autism Spectrum Disorders

BRS held 10 meetings of the Autism Spectrum Disorder (ASD) Committee in order to develop more responsive services for individuals with autism spectrum disorders.

As a result of these efforts BRS assisted 100 Individuals with Autism Spectrum Disorders achieve successful employment outcomes. This represents a 15% increase over FFY 2014.

Goal 3: To increase access to services for all individuals with disabilities.

#### Priority areas:

- 1. Services for Individuals who are Deaf
  - BRS created additional services, Hearing Assistive Technology Services (HATS) and HATS Evaluation services, for individuals who are Deaf or Hard of Hearing. HATS products may be approved for purchase when required for a consumer to maintain employment, comparable devices of lesser cost have been explored, and the products are not available as a reasonable accommodation through their employer. Examples include T Coil Loops and Silhouettes, FM Systems, Amplified or Bluetooth Stethoscopes, Pocket Remotes, Bluetooth accessory adapters, and HATS products produced by hearing aid manufacturers that only work with one's personal hearing aids.
  - BRS has translated five of 14 distance learning modules into American Sign Language (ASL), the remaining nine are scheduled for translation over the next two years.

- 2. Services for individuals whose primary language is Spanish
  - BRS has translated five of 14 distance learning modules into Spanish, the remaining nine are scheduled for translation over the next two years.

#### 3. Cultural Competencies for Staff

BRS is committed to assisting individuals with the most significant disabilities to achieve competitive employment outcomes. Efforts have been initiated and specialized training on how to work with underserved target groups (mental health disorder, substance abuse, learning disabilities, Deafness, Autism Spectrum) has been provided, or is scheduled to be provided. Trainings are comprised of both in-person and online modules.

**Goal 4:** To create effective partnerships designed to advance employment for Connecticut citizens with disabilities.

Priority areas:

1. Businesses

In FFY 2015, BRS negotiated 160 On-the-Job Training (OJTs). BRS also contracted with the following eight Industry Specific Training and Placement Programs (ISTPPs):

- Southeastern Employment Services/Lowes Distribution Center
- Community Enterprises/Mohegan Sun
- Community Enterprises/Walgreens Retail Stores
- Ability Beyond/Walgreens Retail Stores
- Ability Beyond/Crowne Plaza
- Community Enterprises/Mystic Aquarium
- Community Enterprises/Homegoods Distribution Center
- Kennedy Center/CVS Retail.

From these ISTPP partnerships, 117 individuals participated in training; 66 individuals were hired permanently upon successful completion of the training.

- 2. Community Rehabilitation Providers
- BRS completed the CRP Distance Learning Modules created for staff in CRP agencies to understand the core services that BRS contracts with providers. The first module is a CRP overview, which is also available to the public in the Connect-Ability Website. The following modules are only available to CRP agencies: Assessment Services, Job Placement Services, On-the-Job Training, Job Coaching Services, Interview Preparedness Services and Fiscal Services. These modules are effective ways to increase knowledge about BRS services for the CRPs who traditionally have high staff turnover and lack the capacity to train new employees in a timely manner. BRS has the capability of monitoring agency participation of staff that enrolls in the training. These tools were developed in conjunction with the CRP agencies through the BRS CRP Committee.
- As part of the Annual Review Process, each CRP agency reports to BRS on the staff that have taken the DL modules as well as staff who have participated in one of three BRS CRP trainings that are offered throughout the year.

- Four new CRPs were developed during this fiscal year.
- 3. State Agencies
  - With the implementation of WIOA, BRS has collaborated with the core partners to unify the job services available for consumers seeking employment opportunities.
- (2) An evaluation of the extent to which the Supported Employment program goals described in the Supported Employment Supplement for the most recent program year were achieved. The evaluation must:
  - (A) Identify the strategies that contributed to the achievement of the goals.
  - (B) Describe the factors that impeded the achievement of the goals and priorities.

#### Supported Employment Strategies

Supported Employment goals were achieved using the following strategies:

- VR Supported Employment Foundations Training was expanded to two days for new VR Counselors. Senior VR counselors are also invited to the training to get a refresher on the current SE environment as well as provide technical assistance to the training.
- In addition, a BRS and DMHAS protocol document was developed by both agencies to provide technical assistance on Supported Employment Policy and Procedures for both agencies. Both agencies participated in a combined training for VR staff, mental health staff, CRP staff on an ongoing basis.
- Collaborative meetings were held quarterly with partners.

#### Impeding Factors for Achieving Goals and Priorities

- Consistent policies and practices in and between agencies administering Supported Employment programs continue to be a challenge for all stakeholders, including providers.
- Staff turn-over is frequent and coordinating collaborative trainings and providing technical assistance is difficult. While this has been a challenging effort, training is still a priority for VR and partner agencies and providers.
- (3) The VR program's performance on the performance accountability indicators under section 116 of WIOA.

BRS awaits the publishing of the performance accountability thresholds that will be required.

(4) How the funds reserved for innovation and expansion (I&E) activities were utilized.

I&E funds were used in the following three areas:

- **1. Individualized Financial Capability Coaching** is available to BRS consumers at age 18 who receive Social Security Benefits. Participants receive Benefits Counseling to understand the impact of earnings on benefits and an opportunity to plan for the future using the following topics and tools:
  - One-on-one Financial Coaching:
  - Personal Financial Education Sessions:
  - Work vs Benefits Discussion;

- Goal-Setting Support;
- Help to Create a Working Budget;
- Debt Reduction Tools; and
- How to Make Tax Credits Work.

BRS funds this pilot specifically tailored to meet the needs of individuals receiving Social Security benefits through an award to the Connecticut Association for Human Services (CAHS), a private non-profit agency.

Measures of success will be based on a consumer's improved financial literacy and his/her ability to budget a household, create realistic goals, understand credit scores (and demonstrate actions to maintain or improve them), increase self–sufficiency, obtain employment/increase wages, and go off of SSDI and/or SSI benefits. The number of new checking, savings or equivalent accounts that are opened will also be counted.

#### 2. State Independent Living Council

During fiscal year 2015, the State Independent Living Council (SILC) received \$103,000 in Innovation and Expansion (I & E) funds to support the general operation of the Council. This included salaries for two full-time staff, office rent, supplies, phone and computer services, and SILC meeting expenses such as transportation, interpreter services, CART, and other accessibility costs. In addition to the administration and operation of the federally mandated SILC, staff is responsible for developing, implementing, and evaluating the State Plan for Independent Living (SPIL). The I & E funds also supported the development of the Standards of Performance for the CILs and the development of SPIL Goal 2 to expand the capacity and build sustainability for the five CILs.

Much of 2015 was spent in developing the Standards of Performance, with approval and implementation. The overarching aim of Goal 2 is to provide capacity-building and sustainability support to the CILs in order to improve the provision of IL services, preemployment/employment opportunities for consumers, and services to unserved and underserved consumers and geographic areas. BRS has continued to support the SILC Resource Plan with I & E funding, of \$103,000 in the current SPIL for FFY 2015.

#### 3. State Rehabilitation Council

The State Rehabilitation Council (SRC) received \$24,350 to support efforts to assist BRS in assessing programs and services provided to vocational rehabilitation consumers. The SRC incurs travel expenses to in-state meetings and sign-language interpreters, when needed. The SRC sends a delegate to attend out-of-state conferences for the National Coalition of State Rehabilitation Councils (NCSRC) and the Council of State Administrators for Vocational Rehabilitation (CSAVR). The SRC is an organizational member the NEAT Marketplace, a Connecticut facility that provides training and support with assistive technology devices. It also supports the Connecticut Youth Leadership Project by providing funds to support its summer advocacy training program for youth with disabilities and a scholarship towards post-secondary education for a former participant. In 2015, the SRC also collaborated with BRS to engage the Center for Public Policy and Social Research at the Central Connecticut State University to conduct a consumer satisfaction survey of current and former BRS consumers.

#### (q) Quality, Scope, and Extent of Supported Employment Services. Include the following:

- (1) The quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities.
- (2) The timing of transition to extended services.

#### **Program Status**

BRS is allocated \$255,000 annually for the Title VI, Part B Funds and expects to expend all of its allocation. The bureau continues to focus on the quality services delivered through collaborations with our state and local community rehabilitation service partners for the Federal Fiscal Year (FFY) 2015.

WIOA changes the way Supported Employment and Extended services will be delivered. Supported Employment services:

- extension of SE services timeframe from 18 to 24 months; and
- 50% of SE funds apply to all youth, which includes PETS.

#### **Extended Services:**

- services can be provided for a period of up to/but not to exceed 4 years to youth with the most significant disabilities expending supported employment Title VI funds; and
- Prior to WIOA, these services not previously permitted for youth with disabilities under VR program or Supported Employment program.

For Supported Employment services, BRS will provide statewide training for all staff to support and empower counselors in making a shift towards more efficient plan development; in particular moving students with disabilities to plan (VR) while still exploring the potential need for Ongoing Supports.

- As the need for SE is established and funding identified for ongoing support, VR plans can be amended to Supported Employment Plans.
- Utilization of short term plans as a means towards assuring better opportunities for transitioning youth who are expected to be in our system for longer periods of time

For Transition to Extended Services, BRS will work with relevant state agencies, private non-profit organizations and our other partners to transition consumers from Title VI, Part B funding to the identified provider of the ongoing, long-term support funding as soon as the funding is available and transition is appropriate. Use of Title VI, Part B funds will vary, based on the needs of the individual consumer, but will generally not exceed 24 months in length.

#### Coordination and Collaboration

BRS is engaged in facilitating systemic changes in how supported employment services are delivered in the community. The bureau works with relevant state agencies, private non-profit organizations and other partners to transition consumers from the Title VI, Part B funding to an appropriate ongoing employment support program. The bureau oversees one of the three state-funded long-term supports programs and in SFY2012 spent approximately \$1 million in serving VR consumers after VR services were completed. These efforts have led to internal and external improvements in our state system and have built a foundation for a strong Supported Employment service program in this state.

# VOCATIONAL REHABILITATION CERTIFICATIONS AND ASSURANCES CERTIFICATIONS

#### States must provide written and signed certifications that: The (Bureau of Rehabilitation Services,) is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by WIOA,<sup>2</sup> and its supplement under title VI of the Rehabilitation Act<sup>3</sup>; As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the (enter the name of designated State agency)<sup>4</sup> agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan<sup>5</sup>, the Rehabilitation Act, and all applicable regulations<sup>6</sup>, policies, and procedures established by the Secretary of Education. Funds made available under section 111 of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan; As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for 3. supported employment services, the designated State agency agrees to operate and administer the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan<sup>7</sup>, the Rehabilitation Act, and all applicable regulations<sup>8</sup>, policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan; The designated State agency and/or the designated State unit has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement;

5.

The State legally may carry out each provision of the VR services portion of the Unified

or Combined State Plan and its supplement.

<sup>&</sup>lt;sup>2</sup> Public Law 113-128.

<sup>&</sup>lt;sup>3</sup> Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.

<sup>&</sup>lt;sup>4</sup> All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

 $<sup>^5</sup>$  No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act .

<sup>&</sup>lt;sup>6</sup> Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3485; and the State VR Services Program regulations.

<sup>&</sup>lt;sup>7</sup> No funds under title VI of the Rehabilitation Act may be awarded without an approved supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

<sup>&</sup>lt;sup>8</sup> Applicable regulations, in part, include the citations in footnote 6.

6.	All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law.
7.	The (State Treasurer) has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement;
8.	The (Director, Bureau of Rehabilitation Services) has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services;
9.	The agency that submits the VR services portion of the Unified or Combined State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement.

#### **ASSURANCES**

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances:

The	e State Plan must provide assurances that:
1.	<b>Public Comment on Policies and Procedures:</b> The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.
2.	Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.
3.	Administration of the VR services portion of the Unified or Combined State Plan: The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:  (a) the establishment of the designated State agency and designated State unit, as

- required by section 101(a)(2) of the Rehabilitation Act..
- (b) the establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. The designated State agency or designated State unit, as applicable (Option A or B must be selected):
  - (A) is an independent State commission.
  - (B) has established a State Rehabilitation Council
- (c) consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act.
  - the non-Federal share, as described in 34 CFR 361.60.
- (d) the local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the local administration of VR funds, (No)
- (e) the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act . Select yes or no, as appropriate, to identify if the designated State agency allows for the shared funding and administration of joint programs, (No)
- (f) statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. Is the designated State agency is requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? (No) See Section 2 of this VR services portion of the Unified or Combined State Plan.
- (g) the descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11), (24)(B), and 606(b) of the Rehabilitation Act.
- (h) all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act .
- (i) the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act.
- (j) the compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act.
- (k) the reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities.
- (1) the submission of reports as required by section 101(a)(10) of the Rehabilitation Act.
- 4. **Administration of the Provision of VR Services:** The designated State agency, or designated State unit, as appropriate, assures that it will:
  - (a) comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act.
  - (b) impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act.
  - (c) provide the full range of services listed in section 103(a) of the Rehabilitation Act as

- appropriate, to all eligible individuals with disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act? (Yes/No)
- (d) comply with all required available comparable services and benefits, determined to be available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act and.
- (e) comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act.
- (f) comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act.
- (g) provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act.
- (h) comply with the requirements for the conduct of semiannual or annual review, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act, as required by section 101(a)(14)of the Rehabilitation Act.
  - (i) meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs

#### 5. | Program Administration for the Supported Employment Title VI Supplement:

- (a) The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act.
- (b) The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act.
- 6. (a) **Financial Administration:** The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act.
  - (b) The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with

	section 606(b)(7)(A) and (D), of the Rehabilitation Act.
7.	(a) <b>Provision of Supported Employment Services:</b> The designated State agency
	assures that it will provide supported employment services as defined in section 7(39)
	of the Rehabilitation Act.
	(b) The designated State agency assures that:
	i. the comprehensive assessment of individuals with significant disabilities
	conducted under section 102(b)(1) of the Rehabilitation Act and funded
	under title I of the Rehabilitation Act includes consideration of supported
	employment as an appropriate employment outcome, in accordance with
	the requirements of section 606(b)(7)(B) of the Rehabilitation Act
	ii. an individualized plan for employment that meets the requirements of
	section 102(b) of the Rehabilitation Act, which is developed and updated
	with title I funds, in accordance with sections 102(b)(3)(F) and
Ì	606(b)(6)(C) and (E) of the Rehabilitation Act.

#### THESE GOALS HAVE NOT YET BEEN ESTABLISHED

#### **Appendix 1: Performance Goals for the Core Programs**

Include the State's expected levels of performance relating to the performance accountability measures based on primary indicators of performance described in section 116(b)(2)(A) of WIOA.

	Projected	PY 2016 / FY 2017		PY 2017 / FY 2018			
	Baseline			Proposed Final Change			Proposed Final Change
		Proposed	Negoti ated	in Performance	Proposed	Negotiated	in Performance
Employment (Second Quarter after Exit)							
Adults							
Dislocated Workers							
Youth							
Wagner- Peyser / Labor Exchange							
Adult Education							
Rehabilitative Services							
Employment (Fourth Quarter after Exit)							
Adults							
Dislocated Workers							
Youth							
Wagner- Peyser / Labor Exchange							
Adult Education							
Rehabilitative Services							
Median Earnings (Second							

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Quarter after Exit							
Adults							
Dislocated							
Workers							
Youth							
Wagner-							
Peyser / Labor Exchange							
Adult							
Education							
Rehabilitative							
Services							
Credential Attainment							
Rate							
Adults							
Dislocated							
Workers							
Youth							
Wagner-							
Peyser / Labor							
Exchange Adult							
Education							
Rehabilitative							
Services							
Measureable Skill Gains							
Adults							
Dislocated							
Workers							
Youth							
Wagner-							
Peyser / Labor Exchange							
Adult							
Education							
Rehabilitative Services							
Effectiveness							
in Serving							
Employers							
Adults							

Dislocated				
Workers				
Youth				
Wagner-				
Peyser / Labor				
Exchange				
Adult				
Education				
Rehabilitative Services				
Combined				
Federal				
Partner				
Measures				
1				
2				
3				
etc.				
State /				
Governor				
Education and				
Workforce Measures				
1 vieasures				
2				
2				
3				
etc.				

#### PRA BURDENS TABLE

OMB	Topic	Estimated	Citation for Requirement					
Control		Total	to Respond					
Number		Burden	-					
Common Form Elements								
1205-	Common Requirements and Program-Specific requirements for:	3,268	WIOA sec. 102 and 103					
0NEW	The Adult Program, the Dislocated Worker Program, the Youth	hours						
	Program, the Wagner-Peyser Act Program, the Adult Education							
	and Literacy Program, and the Vocational Rehabilitation							
	Program							
1205-	Two Special Combined State Plan Questions: Section I of	10 hours	WIOA sec.					
0NEW	document "WIOA State Plan Type" and Section IV of document		102(b)(2)(C)(viii)					
	"Coordination."							
	tal Collections for Combined Plan Partners' Program-Specific							
1830-0029	Carl D. Perkins Career and Technical Education Improvement	2,240	Sections 122(a)(1) and					
	Act of 2006 (P.L. 109-270) State Plan Guide	hours	201(c) of the Carl D.					
			Perkins Career and Technical Education Act of					
			2006 (Act), 20 U.S.C. 2301					
			et seq. as amended by P.L.					
			109-270, and WIOA sec.					
			103					
0970-0145	Temporary Assistance for Needy Families (TANF) State Plan	594 hours	42 U.S.C. 602, and WIOA					
	Guidance		sec. 103					
0584-0083	Supplemental Nutrition Assistance Program Operating	1431	7 CFR 271-274.1, and					
	Guidelines, Forms, and Waivers, Program and Budget Summary	hours <sup>9</sup>	WIOA sec. 103					
	Statement							
1205-	Trade Adjustment Assistance	50 hours	WIOA sec. 103					
0NEW								
1225-0086	Grant Application Requirements for the Jobs for Veterans State	1620	38 U.S.C. § 4102A(c), and					
	Grants Program	hours	WIOA sec. 103.					
1205-0132	Unemployment Insurance State Quality Service Plan Planning	1530	29 CFR 97.40					
	and Reporting Guidelines	hours	ET Handbook No. 336 18 <sup>th</sup>					
			Edition, and WIOA sec.					
1205 0040	Canian Community Compias Employment Duagnos Danf	406 h asses	103.					
1205-0040	Senior Community Service Employment Program Performance Measurement System	406 hours	20 CFR Part 641, and WIOA sec. 103					
1205-	HUD Employment and Training Activities	tbd <sup>10</sup>	, and WIOA sec. 103					
0NEW	TOD Employment and Training Activities	ιυu	, and with sec. 105					
0970-0382	Community Services Block Grant (CSBG) Model Plan	112	Section 676(b) of the					
0770-0302	Applications	hours <sup>11</sup>	Community Services Block					
		110410	Grant (CSBG) Act (42					
			U.S.C. 9908(b)), and WIOA					
			sec. 103.					
1205-	Reintegration of Ex-Offenders Program	40 hours	WIOA sec. 103					
0NEW								
0111111		<u> </u>	<u> </u>					

 $<sup>^{9}</sup>$  This number represents estimated average burden for the portion of the SNAP plan that covers programs authorized under section 6(d)(4) and section 6(o)of the Food and Nutrition Act of 2008 only.

This number represents estimated average burden for the portion of HUD program plans that cover employment and training activities only.

This number represents estimated average burden for the portion of the CSBG plan that covers employment and training activities only.